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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Review of the Commission's Regulations Governing Television Broadcasting	)	MM Docket No. 91-221
	)	
Television Satellite Stations Review of Policy and Rules	)	MM Docket No. 87-8
	)	
Review of Communications Regulations Governing Attribution of Broadcast Interests	)	MM Docket No. 94-150

COMMENTS OF THE NETWORK AFFILIATED STATIONS ALLIANCE

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May 17, 1995

SUMMARY

The proposal to increase the limits on the number of television stations an entity may own should be adopted, but the Commission should not permit networks to exceed the current 25 percent national coverage cap. Increasing the coverage cap would increase the power of networks over their affiliates significantly and would do violence to important Commission policies favoring localism in television broadcasting.

Localism — the ability of a broadcast station to program local public-interest programming, features, sports, telethons and other broadcasts rather than national programming — is an important element of Commission policy. As trends towards national programming continue, it is vital to protect this unique aspect of broadcasting in the United States. Increasing the ownership cap would increase network power to thwart local programming decisions because separately-owned affiliates will lose much of their leverage in network-affiliate negotiations. Consequently, the Commission should avoid shifting more power to the networks, lest it do irreparable harm to the network-affiliate relationship.

The Commission also should recognize that the networks have the ability to achieve far greater reach than the rules would appear to allow. Through acquisitions of less than controlling interests in television stations, the networks have increased their influence significantly. In fact, if these interests were counted towards the ownership limits, three of the four networks would be over the 25 percent national coverage cap. As a consequence of these transactions, each network has greatly increased its power in the market for its own programming. In light of the significant and growing market power of the networks, any further increase in the national ownership cap for networks would be inappropriate.

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COMMENTS OF THE NETWORK AFFILIATED STATIONS ALLIANCE

The NBC Television Affiliates Association, the CBS Television Affiliates Association and the ABC Television Affiliates Association (together, the "Network Affiliated Station Alliance" or "NASA") hereby submit their comments in response to the Further Notice of Proposed Rule Making in the above-referenced dockets.[1/] As shown below, the Commission should not take any action that would diminish localism and should avoid granting the networks unreasonable levels of market power in dealing with their affiliates. While the Commission should liberalize its national ownership rules to eliminate the numerical limitation on the number of stations that an entity may own, it should retain its essential audience reach cap.

1/ Review of the Commission's Regulations Governing Television Broadcasting; Television Satellite Stations Review of Policy and Rules, *Further Notice of Proposed Rule Making*, MM Docket Nos. 91-221 and 87-8, rel. Jan. 17, 1995 (the "Notice"). Because these comments also raise issues relevant to broadcast attribution, the Network Affiliates also are submitting them under the caption in the Commission's pending attribution proceeding. *See* Review of Communications Regulations Governing Attribution of Broadcast Interests, *Notice of Proposed Rule Making*, MM Docket No. 94-150, rel. Jan. 12, 1995.

I. Introduction

Collectively, NASA represents more than 600 television stations providing free universal television service to almost the entire nation. Network affiliates have decades-long experience in dealing with the networks, and that experience reinforces their conclusion that the Commission should not embark upon rule modifications that would increase the network power in the programming marketplace. While there have been technological changes over the last decade, they have not meaningfully reduced the power of networks in the network-affiliate relationship. Moreover, the networks recently have taken steps to increase their power in affiliate relationships without any change in the FCC's ownership rules.

In particular, the Commission must consider its rules in the context of the longstanding and important policies favoring localism in broadcasting, that is, the ability to program local public-interest programming, features, sports, telethons and other local broadcasts rather than national network programming. As shown below, localism is one of the Commission's most important public policy goals, and rule changes that allow the networks to increase their power over affiliates inevitably will reduce localism.

Taken together, these considerations demonstrate that there would be significant dangers to increasing the national coverage cap for television stations owned by networks. Consequently, the Commission should not increase the current 25 percent cap.

II. Broadcast Ownership Rules Are Designed to Promote Localism.

Sustaining an affiliate's ability to broadcast local programming rather than national programming is one of the Commission's most fundamental goals. The policy favoring localism is a fundamental expression of the way broadcast stations are licensed, because

American society is built upon local community expression.[2] Many factors can threaten localism, but the sources of the most persistent pressure against a local focus in television are the major national networks. Modifying the Commission's ownership rules to permit networks to own more stations will increase these pressures, to the detriment of the broad public interest.

A. Localism Is an Important Policy Objective that Is Threatened by Increased Network Influence.

As it was sixty years ago, localism is today an important policy objective. The Commission's commitment to localism in broadcast television is most prominently displayed in the television table of allotments, but it is a recurring theme in Commission rule makings and adjudication. *See* 47 C.F.R. § 73.606. Local ownership has long been one of the criteria in broadcast comparative hearings. *See Policy Statement on Comparative Broadcast Hearings*, 1 F.C.C.2d 393, 396 (1965). Over a span of several decades, the Commission consistently has reaffirmed its belief in broadcast localism.[3] When Congress adopted must carry rules in the 1992 Cable Act, it reinforced the importance of local broadcast stations. *See* 47 U.S.C. §§ 534, 535.

The commitment to localism is by no means an anachronism. Localism is increasingly important as trends towards national homogenization of the media continue.

2/ The reservation of local authority is reflected even in the constitutional provision reserving powers not delegated to national authority to the states. *See* U.S. CONST. Amend. X.

3/ *See, e.g., Report on Chain Broadcasting*, Commission Order No. 37, Docket 5060 (1941), *modified, Supplemental Report on Chain Broadcasting* (1941), *appeal dismissed sub nom. NBC v. United States*, 47 F. Supp. 940 (1942), *aff'd* 319 U.S. 190 (1943).

New media, such as cable channels and direct broadcast satellite service, are increasingly national and even international in scope. As national media outlets expand, the need for local media outlets, particularly outlets with the locally ubiquitous reach of broadcast television stations, does not diminish; rather, it grows.

Localism is particularly important because it permits broadcasters to tailor their programming to the needs and interests of their communities. For instance, a number of ABC-affiliated stations choose not to carry *NYPD Blue* because they have concluded that this program is not appropriate to the communities they serve. Stations often carry news and information programming of specific local interest, preempting network programming to do so. Most recently, a number of network-affiliated stations made the local decision to carry Speaker Gingrich's speech on the first 100 days of the Republican-led Congress, although their networks chose not to carry that speech.

Local network affiliates make these decisions because they are in touch with the concerns and needs of their local markets. As networks' influence over their affiliates grows, however, it becomes more and more difficult for local stations to make these decisions because of the networks' ability to penalize affiliates for preempting network programming. Thus, it is important for the Commission to work to maintain the uneasy balance in the relationship between networks and their affiliated stations. As shown below, that balance would be upset if the Commission permitted networks to meaningfully increase their ownership of television stations.

B. Increasing the Threshold for Network Ownership of Television Stations Will Reduce the Ability of Affiliates to Serve Their Local Communities of License.

It already is difficult for local affiliates to resist bowing to network pressures for uniform national programming. Networks have many ways to influence their affiliates to carry network programming, and they do not hesitate to use those tools. Permitting the networks to increase their ownership of television stations will only increase network programming influence to the detriment of local programming decisions.

First, there are significant pressures on affiliates to cede more power to their networks. For instance, in recent years networks have sought long-term affiliation agreements with terms that make it difficult if not impossible to exercise their independent judgment about network programming. These terms may include significant financial disincentives to carrying local programming, or other affiliation agreement provisions that reduce an affiliate's flexibility to carry non-network programming during times when the network provides programming. While affiliates resist these terms, the networks still try to impose them.

At the same time, networks continue to expand their programming, and seek to occupy more and more of the broadcast day. CBS's recent efforts to gain clearances for the *Late Show with David Letterman* are well known.[4/] CBS recently added another hour of late night programming. There also have been recent proposals to increase the time for the networks' national news programs. These proposals are particularly disturbing because they

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4/ *See, e.g.*, Mike Freeman, Steve Coe and Joe Flint, *Late-night players jockey for clearance*, BROADCASTING & CABLE, Aug. 16, 1993, at 17 (describing efforts to obtain clearance in Washington, D.C. and other markets).

would most likely result in reduction of the time available for local news, the most important and consistent local programming.

The reason for networks' continual pressure for more clearances is simple: ubiquitous nationwide availability of a program significantly increases the advertising revenue available to the network. Thus, the networks always will have the incentive to use whatever power they have to thwart local decisionmaking and impose national programming.

Regardless of the specifics of network efforts to increase control over affiliates, those efforts inevitably decrease localism. The effect may be direct, as it would be if a half hour of network news replaced a half hour of local news. It also may be indirect, as pressure for clearances results in local decisions not to buck network demands for time even when local programming may better serve the needs of the affiliate's community. Thus, the Commission must be cognizant of changes in its rules that increase network power over their affiliates.

Increasing the coverage threshold in the Commission's ownership rules would greatly increase the dangers of network power in the network-affiliate relationship. Indeed, changes in the television marketplace and the Commission's rules already have increased the power of networks dangerously. In particular, as the number of television stations has increased in recent years, network affiliation has become even more important than it was in the past. Even with the advent of Fox, the value of a network affiliation has become greater, not less, as time goes on.

The Commission's liberalization of its rules governing network behavior, particularly the upcoming abolishment of the financial interest and syndication rules, also has increased network power. Equally important, these changes have increased the networks' interest in exercising their power. For instance, financial interests in programming greatly affect a network's incentive to influence carriage of that programming because the network has more at stake. In addition, and as described below, the networks have begun to take advantage of exceptions to the Commission's ownership rules to extend their influence to an ever-increasing circle of stations in which they have significant, but less than controlling, ownership interests.

In this context, increases in the national ownership threshold for networks are likely to have significant ill effects on independent affiliates. It is important to understand that the collective network-affiliate relationship is based, in large part, on the simple fact that networks and affiliates need each other. The networks' need for affiliates to carry their programming gives them incentives to provide programming that meets the needs of affiliates, to compensate affiliates fairly and otherwise to treat affiliates more reasonably than they would otherwise. The networks do not have these incentives for the stations they own. Indeed, network-owned stations are in no position to demand fair treatment because they have no choice in the matter.

Moreover, as network ownership of individual stations grows, networks need independent-minded affiliates less and less because more affiliates will have no power to contest the terms offered by networks and fewer will be in any position to negotiate. Because the balance between networks and affiliates depends in part on the collective bargaining power of all separately-owned affiliates, any meaningful increase in the number of network-owned stations is likely to tip the balance decisively in favor of the networks. For instance, as the audience reach of network-owned stations increases, the network affiliate associations will have less power to influence network policies because their members will account for a smaller percentage of the networks' total audiences.

This will have two results. The first is that networks will have significantly greater financial leverage in negotiations with separately-owned affiliates. As the number of affiliates that are network-owned grows, separately-owned affiliates will have less power to demand fair compensation.

Second and of paramount importance, changing the balance of network power will significantly affect the ability of affiliates to make local decisions about programming and other matters. This plainly would be the case for network-owned stations.[5/] It also will be true for separately-owned affiliates because networks will have fewer economic incentives to bargain reasonably about such matters as program clearances or the nature of the programming that independent-minded affiliates will carry. The result will be that stations will have less and less ability to make decisions about the needs of their communities. Localism, whether represented by locally responsive programming or by decisions not to carry programming that is inappropriate for the community, will suffer dramatically as a result.

Thus, in an environment where the balance of power between networks and their independent affiliates already is tilted dramatically towards the networks, and where networks already wield considerable power, the Commission should not act to shift that balance further

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5/ This is not a significant concern for stations that are not owned by networks, even those that are owned by large group owners. Group ownership by itself does not remove the incentive to respond to local needs because a group owner still is most concerned about the performance of each television station in its individual market. A network, by contrast, is most likely to be concerned about the clearance of its network programming and national spot advertising, a concern unrelated to specific local needs.

in favor of the networks. Doing so could cause irreparable damage to the Commission's longstanding policies favoring localism with no compensating benefit to the public interest.

III. The Commission's Existing Rules Permit Network-Owned Stations to Have Far Greater Reach than the Thresholds Would Suggest.

Increasing the existing national coverage threshold for networks would have significant, detrimental effects for the reasons described above. An additional reason that increasing the threshold would be risky is that the current rules for determining compliance with the threshold significantly understate the networks' ownership interests. These interests give networks significant market power in the relevant market, which is the market for the services offered by each network. Increases in the national threshold would only magnify this unrecognized market power of the networks. Consequently, the Commission must take "hidden" ownership interests into account when it considers the effects of increasing the ownership threshold. The Commission would err if it attempted to consider modifying its television ownership rules without also recognizing the effect of the attribution rules on television ownership.

Under current ownership rules, many interests are not considered as attributable for the purpose of determining whether a station owner complies with either the 12 station or 25 percent audience reach standards. These interests, such as non-voting stock, do not count because the Commission assumes that they do not confer any influence on the owner of the interest.[6]

6/ 47 C.F.R. § 73.3555, Note 2. The same analysis underlies the "single majority shareholder" rule which exempts all other interests from attribution if one entity owns the majority of the voting stock in a licensee corporation. *Id.*

This assumption may be appropriate in some cases, but certainly not for network interests in television stations. In practice, networks use minority and non-voting equity interests as a device to lock in network affiliation compliance and to otherwise increase their power. Indeed, the very fact of network ownership, cognizable or not, alters the fiduciary obligations of the majority owner so that the owner may have an obligation to favor the network. As a result of both the direct use of investments to gain affiliations and the indirect effects of network ownership, less than controlling ownership of a broadcast station by a network has substantially the same consequences as a controlling ownership interest.

The networks have recognized these facts and acted on them. Over the past year, the networks have engaged in a rush to increase their less than controlling interests in broadcast stations. When their minority interests are counted, ABC, CBS and Fox each have interests in television stations with coverage of more than 25 percent of the nation, using the Commission's methodology.[7] If all of Fox's current and proposed station investments are included in the calculation, it would have ownership and other interests in **28 stations** with a collective nationwide coverage of **more than 38 percent** of the nation. If UHF stations were counted at 100 percent of their coverage, Fox's coverage would be significantly greater.

In light of the recent surge in networks' less than controlling interests in broadcast stations, it is necessary for the Commission to conclude, in the words of Commissioner

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7/ A chart showing the current and proposed interests of each network, based on publicly-announced transactions, is attached as Exhibit 1. The percentages on this chart were calculated using the Commission's methodology which counts only half the coverage of UHF stations.

Ness, that "[t]he issue here is the ability to *influence*, not control."[8] Even in the absence of formal control, the networks acquire decisive influence when they invest in stations. This influence is evidenced by, among other things, the long-term affiliation agreements that are part and parcel of every network's non-cognizable investments.

This analysis demonstrates that the networks have significant market power. As described above, the relevant market for networks and their affiliates is the market for the network's services.[9] The networks have significant market power in that market today because they control and/or influence many of the station/buyers' programming decisions, typically including the station/buyers in the most important market segments.[10] Because of the relationships that result from their less than controlling interests, the networks also have effective control of the network programming decisions of many stations that are not counted towards the television station ownership limits.

8/ BBC License Subsidiary L.P., *Memorandum Opinion and Order*, FCC 95-179, rel. Apr. 27, 1995, separate statement of Commissioner Ness at 1 ("BBC License Subsidiary").

9/ The Commission's analysis, which treats the entire video programming market as a whole, concludes that "current levels of industry concentration are low by antitrust standards." Notice at ¶ 98. This analysis does not consider the separate market for the programming of each network. These markets are separate from each other because network affiliates, to a large extent, are locked in to their network affiliations. Changing or dropping a network affiliation is a difficult and expensive process, often with significant negative consequences. As a result, there is much less cross-elasticity and substitutability between networks, or between having a network affiliation and replacing the affiliation with a schedule of non-network programming, than might otherwise appear.

10/ For instance, each of the four major networks owns stations in New York and Los Angeles, as well as several other top ten markets. Fox, through its less than controlling interests in other stations, plainly influences the buying decisions of those stations as well. *See* BBC License Subsidiary, Statement of Commissioner Ness at 1.

This complex web of majority and minority ownership means that the market for network programming is not a competitive market. Indeed, under the standards the Commission has proposed for affiliate transactions in telephony and cable television, the markets for the programming of ABC, CBS and Fox would now be considered to be subject to the monopoly power of those networks.[11/]

Given the already-significant power of the networks in the market for network programming, any increase in the coverage threshold for network-owned stations would be inappropriate. An increase in the threshold inevitably would result in even greater market power, especially in light of the non-cognizable interests that already have multiplied the influence of networks in their dealings with affiliates. Thus, to avoid giving the networks even more market power than they already wield, the Commission should leave the national coverage threshold of 25 percent in place.

IV. Conclusion

This proceeding presents significant risks to the Commission's underlying policy goals and to the nature of the network-affiliate relationship. The changes in the ownership rules discussed above would grant the networks even more power in what is an already-uneven relationship. As a result, network affiliates would lose their independence and their ability to

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11/ *See, e.g.*, Amendment of Parts 32 and 64 of the Commission's Rules to Account for Transactions between Carriers and Their Nonregulated Affiliates, *Notice of Proposed Rule Making*, 8 FCC Rcd 8071, 8100 (1993) (proposing to apply affiliate transaction rules if telephone company sells less than 75 percent of output to third parties). Although these proposals were not designed for the television marketplace, they illustrate the levels of market control that the Commission deems to require special scrutiny.

respond to local needs. For these reasons, the Network Affiliated Stations Alliance urges the Commission to adopt rules that are consistent with these comments.

Respectfully submitted,

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EXHIBIT 1

NETWORK OWNERSHIP INTERESTS

Call Sign	Channel	City of License	Market/No.	Population/Percentage		Interest
ABC						
Owned and Operated						
WABC-TV	7	New York, NY	New York (1)	6,723,700	(7.16%)	100%
KABC-TV	7	Los Angeles, CA	Los Angeles (2)	4,978,800	(5.30%)	100%
WLS-TV	7	Chicago, IL	Chicago (3)	3,076,500	(3.28%)	100%
WPVI-TV	6	Philadelphia, PA	Philadelphia (4)	2,661,800	(2.83%)	100%
KGO-TV	7	San Francisco, CA	San Francisco (5)	2,225,500	(2.37%)	100%
WTVD(TV)	11	Durham, NC	Raleigh (32)	769,300	(0.82%)	100%
KFSN-TV	30	Fresno, CA	Fresno (57)	465,500	(0.50%)	100%
WTVG(TV)	13	Toledo, OH	Toledo (64)	407,600	(0.43%)	100%
WJRT-TV	12	Flint, MI	Flint (60)	457,800	(.49%)	100%
KTRK-TV	13	Houston, TX	Houston (10)	1,520.900	(1.62%)	100%
				Total:	(24.59%)	
Passive Interest — Consummated in 11/94						
WRIC-TV	8	Richmond, VA	Richmond (61)	448,900	(0.48%)	14.7%
WATE-TV	6	Knoxville, TN	Knoxville (63)	423,400	(0.45%)	14.7%
WBAY-TV	2	Green Bay, WI	Green Bay (72)	366,100	(0.39%)	14.7%
WKRN-TV	2	Nashville, TN	Nashville (33)	731,400	(0.48%)	14.7%
KLFY-TV	10	Lafayette, LA	Lafayette (120)	188,400	(0.20%)	14.7%

Call Sign	Channel	City of License	Market/No.	Population/Percentage		Interest
WLNS-TV	6	Lansing, MI	Lansing (105)	230,200	(0.25%)	14.7%
WKBT(TV)	8	LaCrosse, WI	LaCrosse (128)	169,500	(0.18%)	14.7%
WTEN(TV)	10	Albany, NY	Albany (53)	507,300	(0.54%)	14.7%
WCDC(TV)	19	Adams, MA	Albany (53)	507,300	(0.54%)	14.7%
WTVO(TV)	17	Rockford, IL	Rockford (134)	159,600	(0.17%)	14.7%
				Total:	(3.32%)	
				Current Total:	(27.91%)	

CALL SIGN	CHANNEL	CITY OF LICENSE	MARKET/NO.	POPULATION/PERCENTAGE		INTEREST
BS						
WNED AND OPERATED						
WCAU-TV[1/]	10	Philadelphia, PA	Philadelphia (4)	2,661,800	(2.83%)	100%
WFRY-TV	5	Green Bay, WI	Green Bay (72)	366,100	(0.39%)	100%
KCBS-TV	2	Los Angeles, CA	Los Angeles (2)	4,978,800	(5.30%)	100%
KCCO-TV	7	Alexandria, MN	Minneapolis (14)	1,418,100	(1.51%)	100%
WBBM-TV	2	Chicago, IL	Chicago (3)	3,076,500	(3.28%)	100%
WCBS-TV	2	New York, NY	New York (1)	6,723,700	(7.16%)	100%
WCCO-TV	4	Minneapolis, MN	Minneapolis (14)	1,418,100	(1.51%)	100%
WCIX(TV)[1/]	6	Miami, FL	Miami (15)	1,308,200	(1.39%)	100%
WJMN-TV	6	Escanaba, MI	Marquette (175)	82,100	(0.09%)	100%
				Total:	(23.46%)	
ENDING ACQUISITIONS						
WPRI-TV	12	Providence, RI	Providence (45)	569,700	(0.61%)	100%
WGPR-TV	62	Detroit, MI	Detroit (9)	1,739,100	(1.85%)	100%
KCNC-TV[2/]	4	Denver, CO	Denver (20)	1,090,100	(1.16%)	100%
WTVJ(TV)[2/]	4	Miami, FL	Miami (15)	1,308,200	(1.39%)	100%
KUSG(TV)[2/]	12	St. George, UT	Salt Lake City (41)	614,700	(0.65%)	100%

Currently pending before the Commission are applications to assign these licenses to NBC.

Swap with CBS/NBC; after consummation, CBS will convert this interest into "a non-attributable, non-direct" interest in Station Partners.

Call Sign	Channel	City of License	Market/No.	Population/Percentage		Interest
KUTV(TV)[2/]	2	Salt Lake City, UT	Salt Lake City (41)	614,700	(0.65%)	100%
				Total:	(5.39%)	
Passive Interest						
KYW-TV	3	Philadelphia, PA	Philadelphia (4)	2,661,800	(2.83%)	49%
				Total:	(2.83%)	
				Current Total:	(26.29%)	
				After all anticipated transactions are closed:	(27.46%)	

Call Sign	Channel	City of License	Market/No.	Population/Percentage		Interest
FOX						
Owned and Operated						
KTTV-TV	11	Los Angeles, CA	Los Angeles (2)	4,978,800	(5.30%)	100%
KSTU(TV)	13	Salt Lake City, UT	Salt Lake City (41)	614,700	(0.65%)	100%
KRIV-TV	26	Houston, TX	Houston (10)	1,520,900	(1.62%)	100%
WTTG-TV	5	Washington, DC	Washington (7)	1,822,400	(2.25%)	100%
WNYW-TV	5	New York, NY	New York (1)	6,723,700	(7.16%)	100%
WFLD-TV	32	Chicago, IL	Chicago (3)	3,076,500	(3.28%)	100%
WATL(TV)[3/]	36	Atlanta, GA	Atlanta (11)	1,516,300	(1.61%)	100%
KDAF(TV)[3/]	33	Dallas, TX	Dallas (8)	1,788,000	(1.90%)	100%
				Total:	(19.57%)	
Pending Acquisitions						
WFXT(TV)	25	Boston, MA	Boston (6)	2,116,200	(2.25%)	100%
KDVR(TV)	31	Denver, CO	Denver (20)	1,090,100	(1.16%)	100%
WTXF-TV	29	Philadelphia, PA	Philadelphia (4)	2,661,800	(2.83%)	100%
WHBQ(TV)	13	Memphis, TN	Memphis (42)	604,400	(0.64%)	100%
				Total:	(3.76%)	

3/ Applications on file to sell the stations.

Call Sign	Channel	City of License	Market/No.	Population/Percentage		Interest
Passive Interest						
New World						
KTVI(TV)	2	St. Louis, MO	St. Louis (18)	1,114,200	(1.19%)	20%
WAGA-TV	5	Atlanta, GA	Atlanta (11)	1,516,300	(1.61%)	20%
WBRC-TV	6	Birmingham, AL	Birmingham (50)	531,400	(0.57%)	20%
WJW-TV	8	Cleveland, OH	Cleveland (12)	1,449,700	(1.54%)	20%
WJBK-TV	2	Detroit, MI	Detroit (9)	1,739,100	(1.85%)	20%
WGHP-TV	8	Greensboro, NC	Greensboro (49)	540,900	(0.58%)	20%
WDAF-TV	4	Kansas City, MO	Kansas City (29)	780,700	(0.83%)	20%
WITI-TV	6	Milwaukee, WI	Milwaukee (28)	780,700	(0.83%)	20%
KSAZ(TV)	10	Phoenix, AZ	Phoenix (21)	1,061,300	(1.13%)	20%
WTVT(TV)4/	13	Tampa, FL	Tampa (16)	1,266,600	(1.35%)	20%
KTBC-TV4/	7	Austin, TX	Austin (65)	392,410	(0.42%)	20%
WVTM-TV4/5/	13	Birmingham, AL	Birmingham (50)	531,400	(0.57%)	20%
KDFW-TV4/	4	Dallas, TX	Dallas (8)	1,788,000	(1.90%)	20%
				Total:	(13.80%)	
SF/Savoy						
KHON-TV		Honolulu, HI	----	379,670	(0.40%)	25%

4/ New World has option to purchase from Argyle.

5/ If New World elects to exercise its option to buy WVTM-TV, Birmingham, Alabama, it must sell WBRC-TV, Birmingham, Alabama.

Call Sign	Channel	City of License	Market/No.	Population/Percentage		Interest
WVUE(TV)	8	New Orleans, LA	New Orleans (39)	616,800	(0.66%)	25%
WALA-TV	10	Mobile, AL	Mobile (58)	465,200	(0.50%)	25%
WLUK-TV	11	Green Bay, WI	Green Bay (72)	366,100	(0.39%)	25%
				Total:	(1.95%)	
Blackstar — No applications on file yet						
WBSF(TV)	43	Melbourne, FL	Orlando (23)	972,100	(1.04%)	20%
KBSP-TV	22	Salem, OR	Portland (27)	886,600	(0.94%)	20%
WBSX(TV)	31	Ann Arbor, MI	Lansing (105)	230,200	(0.25%)	20%
				Total:	(1.12%)	
				Current Total:	(28.09%)	
				After all proposed transactions have been closed:	(38.44%)	

Call Sign	Channel	City of License	Market/No.	Population/Percentage		Interest
NBC						
Owned and Operated						
WNBC-TV	4	New York, NY	New York (1)	6,723,700	(7.16%)	100%
KNBC-TV	4	Los Angeles, CA	Los Angeles (2)	4,978,800	(5.30%)	100%
WMAQ-TV	5	Chicago, IL	Chicago (3)	3,076,500	(3.28%)	100%
WRC-TV	4	Washington, DC	Washington (7)	1,822,400	(1.94%)	100%
KCNC-TV[6/]	4	Denver, CO	Denver (20)	1,090,100	(1.16%)	100%
WTVJ(TV)[6/]	4	Miami, FL	Miami (15)	1,308,200	(1.39%)	100%
KUSG(TV)[6/]	12	St. George, UT	Salt Lake City (41)	614,700	(0.65%)	100%
KUTV(TV)[6/]	2	Salt Lake City, UT	Salt Lake City (41)	614,700	(0.65%)	100%
				Total:	(21.53%)	
Pending Acquisitions						
WCAU-TV	10[6/]	Philadelphia, PA	Philadelphia (4)	2,661,800	(2.83%)	100%
WCIX(TV)	6[6/]	Miami, FL	Miami (15)	1,308,200	(1.39%)	100%
				Total:	(4.22%)	

6/ Swap with CBS/NBC.